

**UNITED STATES DISTRICT COURT
NORTHER DISTRICT OF OHIO
EASTERN DIVISION**

Terves LLC,)	
)	Case No. <u>1:19-cv-1611</u>
Plaintiff,)	
)	JUDGE DONALD C. NUGENT
vs.)	
)	
Yueyang Aerospace New Materials Co.,)	<u>DEFENDANTS ECOMETAL, INC.</u>
Ltd.,)	<u>AND NICK YUAN'S UNOPPOSED</u>
)	<u>MOTION FOR EXTENSION OF TIME</u>
and)	<u>WITHIN WHICH TO ANSWER OR</u>
)	<u>OTHERWISE RESPOND</u>
Ecometal Inc.,)	
)	
and)	
)	
Nick Yuan,)	
)	
Defendants.)	

Defendants Ecometal Inc. and Nick Yuan, through their undersigned counsel, hereby move pursuant to Fed. R. Civ. P. 6(b) for (1) an extension of time of up to seven (7) days, to and including September 11, 2019, to move to dismiss the Complaint pursuant to Fed. R. Civ. P. 12(b)(4)-(5) for insufficient process and/or insufficient service of process; and (2) an extension of time of up to thirty (30) days, to and including October 4, 2019, within which to answer or otherwise respond, excluding raising the aforementioned defenses under Fed. R. Civ. P. 12(b)(4)-(5), to the Complaint. This is Defendants' first request for an extension of time. As more fully set out in Defendants' Memorandum in support of this motion, good cause exists for the extension of time

sought in this Motion. Defendants' counsel contacted counsel for Plaintiff Terves LLC, who indicated that Terves LLC does not oppose this motion.

Dated: September 3, 2019.

Respectfully submitted,

/s/ Steven J. Forbes

Steven J. Forbes (0042410)

NORCHI FORBES LLC

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-and-

Evan W. Talley, OBA # 22923 (*pro hac vice*
application forthcoming)

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**ATTORNEYS FOR DEFENDANTS
ECOMETAL INC. AND NICK YUAN**

CERTIFICATE OF SERVICE

I certify that on September 3, 2019, I electronically transmitted the foregoing document to the Clerk of the Court using the ECF system for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Matthew J. Cavanaugh
David B. Cupar

/s/ Steven J. Forbes

One of the Attorneys for Defendants
Ecometal Inc. and Nick Yuan